

Honorable Marsha Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON, SEATTLE

UNITED STATES OF AMERICA,	)	
	)	No. CR05-185P
Plaintiff,	)	
	)	STIPULATION AND AGREED
v.	)	ORDER CONTINUING MOTION
	)	CUTOFF DATE
CYNTHIA ANAYA-CONTRERAS,	)	
	)	
Defendant.	)	
_____	)	

**Stipulation**

The United States of America, by and through John McKay, United States Attorney for the Western District of Washington, and Lawrence Lincoln, Assistant United States Attorney, and defendant Cynthia Anaya-Contreras, by and through her undersigned counsel, Michael Nance, hereby stipulate and agree as follows:

The defendant, together with others, is charged in a multi-count indictment with conspiracy to distribute methamphetamine and cocaine and several substantive counts of distribution of methamphetamine, all in violation of 21 USC § 841(b)(1)(A).

A trial date has been scheduled for July 11, 2005. The pre-trial motion cutoff date for Ms. Anaya-Contreras is currently June 2, 2005.

To date, the defense is still reviewing discovery only recently received. No previous continuance of the cutoff date has been sought. Government counsel expects to be in trial on

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another case during the week of June 20, 2005.

The parties believe additional time within which to file pretrial motions would facilitate a more meaningful evaluation of the evidence, promote informed plea discussions on each side, and allow for a more cogent presentation of issues, if any, by way of motion.

For these reasons the parties agree that the pretrial motion cutoff should be continued until June 16, 2005. In view of the fact that government counsel is in trial beginning June 20, the government shall have until June 30, 2005, to respond to any filed defense motions.

Dated this 2nd day of June, 2005.

/s/ Lawrence Lincoln - by telephone permission - MCN  
Lawrence Lincoln  
Assistant United States Attorney

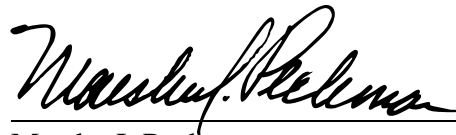
/s/ Michael Nance  
Michael Nance, WSBA # 13933  
Defense Attorney

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**ORDER**

For the reasons set forth in the foregoing stipulation, the court orders that the pre-trial motions cutoff be extended to June 16, 2005. The government shall have until June 30, 2005, to file a response.

Dated this \_\_3<sup>rd</sup>\_\_ day of June, 2005.



Marsha J. Pechman  
U.S. District Judge

Presented by:

/s/ Michael Nance  
Michael Nance  
Defense Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on the 2<sup>nd</sup> day of June, 2005, I electronically filed the foregoing with the clerk of the court using the CM/ECF system. Notice of this filing will be sent electronically to attorneys of record for all parties.

/s/ Michael Nance

Michael Nance, WSBA # 13933

Email: minance@aolcom

Attorney for defendant Cynthia Anaya-Contreras

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